

EXHIBIT 1

(Dec 29, 2020, Warrant Application)



SEALED

Office of the United States Attorney
District of Nevada
501 Las Vegas Boulevard, Suite 1100
Las Vegas, Nevada 89101
(702) 388-6336

UNITED STATES DISTRICT COURT

for the
District of Nevada

FILED.

DATED: 12:08 pm, December 31, 2020

U.S. MAGISTRATE JUDGE

In the Matter of the Search of
(Briefly describe the property to be searched
or identify the person by name and address)

A UNITED STATES POSTAL SERVICE (USPS)
PRIORITY MAIL PARCEL BEARING TRACKING
NUMBER 9114 9023 0722 4923 2571 25

Case No. 2:20mj-1114-BNW

APPLICATION FOR A WARRANT BY TELEPHONE OR OTHER RELIABLE ELECTRONIC MEANS

I, a federal law enforcement officer or an attorney for the government, request a search warrant and state under penalty of perjury that I have reason to believe that on the following person or property (identify the person or describe the property to be searched and give its location):

A UNITED STATES POSTAL SERVICE (USPS) PRIORITY MAIL PARCEL BEARING TRACKING NUMBER 9114 9023 0722 4923 2571 25 (See Attachment A, Exhibit 1)

located in the DEA Las Vegas District of Nevada, there is now concealed (identify the person or describe the property to be seized):

See Attachment B

The basis for the search under Fed. R. Crim. P. 41(c) is (check one or more):

- ☒ evidence of a crime;
- ☒ contraband, fruits of crime, or other items illegally possessed;
- ☒ property designed for use, intended for use, or used in committing a crime;
- ☐ a person to be arrested or a person who is unlawfully restrained.

The search is related to a violation of:

| Code Section | Offense Description |
|-----------------------------|---|
| 18 USC §§ 841(a)(1) and 846 | Conspiracy to Distribute a Controlled Substance |

The application is based on these facts:

See Affidavit

- ☒ Continued on the attached sheet.
- ☐ Delayed notice of _____ days (give exact ending date if more than 30 days: _____) is requested under 18 U.S.C. § 3103a, the basis of which is set forth on the attached sheet.



Applicant's signature

Marc Laing, Special Agent
Printed name and title

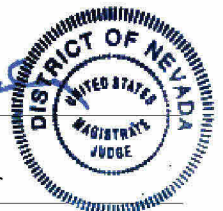
Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by
telephone (specify reliable electronic means).

Date: 12/31/2020

City and state: Las Vegas, Nevada


Judge's signature

Honorable Brenda N. Weksler
Printed name and title



DATED: 12:09 pm, December 31, 2020

UNITED STATES DISTRICT COURT

U.S. MAGISTRATE JUDGE

for the
District of Nevada

In the Matter of the Search of

*(Briefly describe the property to be searched
or identify the person by name and address)*A UNITED STATES POSTAL SERVICE (USPS)
PRIORITY MAIL PARCEL BEARING TRACKING
NUMBER 9114 9023 0722 4923 2583 37

Case No. 2:20-mj-1115-BNW

APPLICATION FOR A WARRANT BY TELEPHONE OR OTHER RELIABLE ELECTRONIC MEANS

I, a federal law enforcement officer or an attorney for the government, request a search warrant and state under penalty of perjury that I have reason to believe that on the following person or property *(identify the person or describe the property to be searched and give its location)*:

A UNITED STATES POSTAL SERVICE (USPS) PRIORITY MAIL PARCEL BEARING TRACKING NUMBER 9114
9023 0722 4923 2583 37 (See Attachment A, Exhibit 2)located in the DEA Las Vegas District of Nevada, there is now concealed *(identify the person or describe the property to be seized)*:

See Attachment B

The basis for the search under Fed. R. Crim. P. 41(c) is *(check one or more)*:

- ☒ evidence of a crime;
- ☒ contraband, fruits of crime, or other items illegally possessed;
- ☒ property designed for use, intended for use, or used in committing a crime;
- ☐ a person to be arrested or a person who is unlawfully restrained.

The search is related to a violation of:

| <i>Code Section</i> | <i>Offense Description</i> |
|-----------------------------|---|
| 18 USC §§ 841(a)(1) and 846 | Conspiracy to Distribute a Controlled Substance |

The application is based on these facts:

See Affidavit

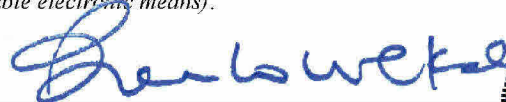
- ☒ Continued on the attached sheet.
- ☐ Delayed notice of _____ days *(give exact ending date if more than 30 days: _____)* is requested under 18 U.S.C. § 3103a, the basis of which is set forth on the attached sheet.



Applicant's signature

Marc Laing, Special Agent

Printed name and title

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by
telephone _____ *(specify reliable electronic means)*.Date: 12/31/2020City and state: Las Vegas, Nevada

Judge's signature

Honorable Brenda N. Weksler

Printed name and title



FILED

DATED: 12:09 pm, December 31, 2020

UNITED STATES DISTRICT COURT

U.S. MAGISTRATE JUDGE

for the
District of Nevada

In the Matter of the Search of

*(Briefly describe the property to be searched
or identify the person by name and address)*A UNITED STATES POSTAL SERVICE (USPS)
PRIORITY MAIL PARCEL BEARING TRACKING
NUMBER 9114 9023 0722 4923 2582 76

Case No. 2:20-mj-1116-BNW

APPLICATION FOR A WARRANT BY TELEPHONE OR OTHER RELIABLE ELECTRONIC MEANS

I, a federal law enforcement officer or an attorney for the government, request a search warrant and state under penalty of perjury that I have reason to believe that on the following person or property *(identify the person or describe the property to be searched and give its location)*:

A UNITED STATES POSTAL SERVICE (USPS) PRIORITY MAIL PARCEL BEARING TRACKING NUMBER 9114 9023 0722 4923 2582 76 (See Attachment A, Exhibit 3)

located in the DEA Las Vegas District of Nevada, there is now concealed *(identify the person or describe the property to be seized)*:

See Attachment B

The basis for the search under Fed. R. Crim. P. 41(c) is *(check one or more)*:

- ☒ evidence of a crime;
☒ contraband, fruits of crime, or other items illegally possessed;
☒ property designed for use, intended for use, or used in committing a crime;
☐ a person to be arrested or a person who is unlawfully restrained.

The search is related to a violation of:

| <i>Code Section</i> | <i>Offense Description</i> |
|-----------------------------|---|
| 18 USC §§ 841(a)(1) and 846 | Conspiracy to Distribute a Controlled Substance |

The application is based on these facts:

See Affidavit

- ☒ Continued on the attached sheet.
☐ Delayed notice of _____ days *(give exact ending date if more than 30 days: _____)* is requested under 18 U.S.C. § 3103a, the basis of which is set forth on the attached sheet.

Applicant's signature

Marc Laing, Special Agent

Printed name and title

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by
telephone *(specify reliable electronic means)*.

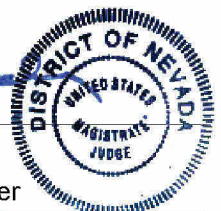
Date: 12/31/2020

City and state: Las Vegas, Nevada

Judge's signature

Honorable Brenda N. Weksler

Printed name and title



FILED

DATED: 12:09 pm, December 31, 2020

UNITED STATES DISTRICT COURT

U.S. MAGISTRATE JUDGE

for the
 District of Nevada

In the Matter of the Search of
 (Briefly describe the property to be searched
 or identify the person by name and address)

A UNITED STATES POSTAL SERVICE (USPS)
 PRIORITY MAIL PARCEL BEARING TRACKING
 NUMBER 9114 9023 0722 4923 2584 12

Case No. 2:20-mj-1117-BNW

APPLICATION FOR A WARRANT BY TELEPHONE OR OTHER RELIABLE ELECTRONIC MEANS

I, a federal law enforcement officer or an attorney for the government, request a search warrant and state under penalty of perjury that I have reason to believe that on the following person or property (identify the person or describe the property to be searched and give its location):

A UNITED STATES POSTAL SERVICE (USPS) PRIORITY MAIL PARCEL BEARING TRACKING NUMBER 9114 9023 0722 4923 2584 12 (See Attachment A, Exhibit 4)
 located in the DEA Las Vegas District of Nevada, there is now concealed (identify the person or describe the property to be seized):
 See Attachment B

The basis for the search under Fed. R. Crim. P. 41(c) is (check one or more):

- ☒ evidence of a crime;
- ☒ contraband, fruits of crime, or other items illegally possessed;
- ☒ property designed for use, intended for use, or used in committing a crime;
- ☐ a person to be arrested or a person who is unlawfully restrained.

The search is related to a violation of:

| Code Section | Offense Description |
|-----------------------------|---|
| 18 USC §§ 841(a)(1) and 846 | Conspiracy to Distribute a Controlled Substance |

The application is based on these facts:
 See Affidavit

- ☒ Continued on the attached sheet.
- ☐ Delayed notice of _____ days (give exact ending date if more than 30 days: _____) is requested under 18 U.S.C. § 3103a, the basis of which is set forth on the attached sheet.

Applicant's signature

Marc Laing, Special Agent
 Printed name and title

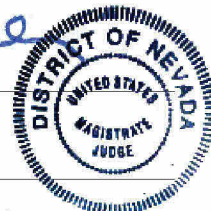
Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by
 telephone (specify reliable electronic means).

Date: 12/31/2020

City and state: Las Vegas, Nevada

Judge's signature

Honorable Brenda N. Weksler
 Printed name and title





SEALED

Office of the United States Attorney
District of Nevada
501 Las Vegas Boulevard, Suite 1100
Las Vegas, Nevada 89101
(702) 388-6336

DATED: 12:11 pm, December 31, 2020

U.S. MAGISTRATE JUDGE

NICHOLAS A. TRUTANICH
United States Attorney
District of Nevada
Nevada Bar Number 13644
CHRISTOPHER LIN
Assistant United States Attorney
501 Las Vegas Boulevard South, Suite 1100
Las Vegas, Nevada 89101
(702) 388-6336
christopher.lin@usdoj.gov

Attorneys for the United States of America

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

IN THE MATTER OF AN APPLICATION
FOR A SEARCH WARRANT FOR:

A UNITED STATES POSTAL SERVICE
(USPS) PRIORITY MAIL PARCEL
BEARING TRACKING NUMBER 9114
9023 0722 4923 2571 25, ADDRESSED TO
RYAN PARENT, 249 CREST RD,
NOVATO, CA 94945 (Attachment "A,"
Exhibit 1).

Case No. 2:20-mj-1114-BNW

**AFFIDAVIT IN SUPPORT OF
SEARCH WARRANT**

(Under Seal)

IN THE MATTER OF AN APPLICATION
FOR A SEARCH WARRANT FOR:

A UNITED STATES POSTAL SERVICE
(USPS) PRIORITY MAIL PARCEL
BEARING TRACKING NUMBER 9114
9023 0722 4923 2583 37, ADDRESSED TO
SPENCER GIETZEN, 450 CENTRAL
WAY UNIT 2403, KIRKLAND, WA 98033
(Attachment "A," Exhibit 2).

Case No. 2:20-mj-1115-BNW

**AFFIDAVIT IN SUPPORT OF
SEARCH WARRANT**

(Under Seal)

IN THE MATTER OF AN APPLICATION
FOR A SEARCH WARRANT FOR:

A UNITED STATES POSTAL SERVICE
(USPS) PRIORITY MAIL PARCEL
BEARING TRACKING NUMBER 9114
9023 0722 4923 2582 76, ADDRESSED TO
ANDREAS OSTI, 130 HEMPSTEAD AVE
APT 401, WEST HEMPSTEAD, NY 11552-
2156 (Attachment "A," Exhibit 3);

Case No. 2:20-mj-1116-BNW

**AFFIDAVIT IN SUPPORT OF
SEARCH WARRANT**

(Under Seal)

IN THE MATTER OF AN APPLICATION
FOR A SEARCH WARRANT FOR:

Case No. 2:20-mj-1117-BNW

A UNITED STATES POSTAL SERVICE
(USPS) PRIORITY MAIL PARCEL
BEARING TRACKING NUMBER 9114
9023 0722 4923 2584 12, ADDRESSED TO
ALEJANDRO RUIZ, 1681 CROCKER RD,
RANDOLPH CENTER, VT 05061
(Attachment "A," Exhibit 4)

**AFFIDAVIT IN SUPPORT OF
SEARCH WARRANT**

(Under Seal)

1. I, Marc Laing, Special Agent (SA), Drug Enforcement Administration (DEA),
being duly sworn under penalty of perjury, do hereby state as follows:

INTRODUCTION AND BACKGROUND OF AFFIANT

2. I am an "investigative or law enforcement officer" of the United States within the meaning of Title 18, United States Code, Section 2510(7); that is, a deputized officer of the United States who is empowered by law to conduct investigations of, and to make arrests for, offenses enumerated in Title 18, United States Code, Section 2516. I have been an SA with the DEA since June 2008 and am currently assigned to the Las Vegas District Office (LVDO), Enforcement Group 3 (EG3). In connection with my DEA duties, I investigate criminal violations of the Controlled Substances Act. Through the DEA, I have received specialized training in the enforcement of federal narcotics laws. My training and experience have involved, among other things: (1) the debriefing of defendants, witnesses and informants, as well as others who have knowledge of the distribution and transportation of controlled substances; (2) the planning, participation and/or management of field operations such as surveillance, arrests, the purchase of controlled substances, and the execution of search warrants; (3) the acquisition, processing and analysis of evidence; and (4) the identification and exploitation of the methodologies by which drug trafficking proceeds are laundered and concealed.

1 3. Based on my training and experience, I have become familiar with the methods
2 used by drug traffickers and drug trafficking organizations to conduct various criminal
3 activities. The aforementioned methods include, but are not limited to, the following: drug
4 manufacturing, distribution, money laundering, and firearms offenses. I have also become
5 familiar with the methods used by such individuals to avoid detection by law enforcement, to
6 include: multiple cellular telephones (including those that are subscribed in the names of other
7 persons), prepaid cellular telephones, counter-surveillance techniques, coded and ambiguous
8 language, usage of multiple vehicles, and false identities.

9 4. The decisions I made and conclusions I reached are based not only upon my own
10 training and experience, but also on the training and experience of other federal agents, TFOs,
11 and state and local law enforcement with whom I have discussed this case. Thus, when I state
12 in this declaration that a particular conclusion is based on my training and experience, it is
13 based on my training and experience, sometimes in conjunction with other law enforcement
14 officers (hereinafter referred to as "agents").

15 5. During my tenure with the DEA, I have conducted surveillance, interviewed
16 witnesses, suspects, cooperating informants, executed search warrants and executed arrest
17 warrants.

18 6. I have been involved in an investigation, which is the subject of this Affidavit.
19 Due to my personal participation in this investigation and reports made to me by other DEA
20 Agents and Law Enforcement Officers, and various sources of information, I am familiar with
21 all of the facts and circumstances surrounding the investigation. My training and experience as
22 an SA, including participation in this investigation, form the basis for opinions and conclusions
23 set forth below. While I have participated in the below described investigation, I have not
24

1 provided every fact known within this Affidavit. Rather, I include only those facts necessary to
2 establish probable cause in support of the search warrant requested herein.

3 7. Based on the facts set forth in this affidavit, there is probable cause to believe that
4 violations of Title 21 U.S.C. Sections 841(a) and 846, have been committed, and that the
5 SUBJECT PARCELS herein identified in Attachment "A," Exhibits 1 - 4 are likely to contain
6 the items identified in Attachment "B," which is evidence of the involvement in the
7 enumerated offenses.

8 **IDENTIFICATION OF THE PARCELS TO BE SEARCHED**

9 8. SUBJECT PARCEL Exhibit 1 is a USPS Priority Mail envelope, bearing a typed
10 Label, and tracking number 9114 9023 0722 4923 2571 25, addressed to Ryan Parent, 249 Crest
11 Rd, Novato, CA 94945, and sent by Retouching by Lorie, 2613 Calico Hearts Ct, Las Vegas,
12 NV 89106. SUBJECT PARCEL Exhibit 1 weighs approximately 81.1 gross grams, and is
13 described as a Priority Mail envelope, measuring approximately 12.5" X 9.5." SUBJECT
14 PARCEL Exhibit 1 is affixed with \$7.75 in postage. SUBJECT PARCEL Exhibit 1 is currently
15 located in the Drug Evidence Vault at the Drug Enforcement Administration Las Vegas District
16 Office, 550 S. Main Street, Las Vegas, NV 89101, located within the District of Nevada.

17 9. SUBJECT PARCEL Exhibit 2 is a USPS Priority Mail envelope, bearing a typed
18 Label, and tracking number 9114 9023 0722 4923 2583 37, addressed to Spencer Gietzen, 450
19 Central Way Unit 2403, Kirkland, WA 98033, and sent by Retouching by Lorie, 2613 Calico
20 Hearts Ct, Las Vegas, NV 89106. SUBJECT PARCEL Exhibit 2 weighs approximately 118.6
21 gross grams, and is described as a Priority Mail envelope, measuring approximately 12.5" X
22 9.5." SUBJECT PARCEL Exhibit 2 is affixed with \$7.75 in postage. SUBJECT PARCEL
23 Exhibit 2 is currently located in the Drug Evidence Vault at the Drug Enforcement
24

Administration Las Vegas District Office, 550 S. Main Street, Las Vegas, NV 89101, located within the District of Nevada.

10. SUBJECT PARCEL Exhibit 3 is a USPS Priority Mail envelope, bearing a typed Label, and tracking number 9114 9023 0722 4923 2582 76, addressed to Andreas Osti, 130 Hempstead Ave Apt 401, West Hempstead, NY 11552-2156, and sent by Retouching by Lorie, 2613 Calico Hearts Ct, Las Vegas, NV 89106. SUBJECT PARCEL Exhibit 3 weighs approximately 80.9 gross grams, and is described as a Priority Mail envelope, measuring approximately 12.5" X 9.5." SUBJECT PARCEL Exhibit 3 is affixed with \$7.75 in postage. SUBJECT PARCEL Exhibit 3 is currently located in the Drug Evidence Vault at the Drug Enforcement Administration Las Vegas District Office, 550 S. Main Street, Las Vegas, NV 89101, located within the District of Nevada.

11. SUBJECT PARCEL Exhibit 4 is a USPS Priority Mail envelope, bearing a typed Label, and tracking number 9114 9023 0722 4923 2584 12, addressed to Alejandro Ruiz, 1681 Crocker Rd, Randolph Center, VT 05061, and sent by Retouching by Lorie, 2613 Calico Hearts Ct, Las Vegas, NV 89106. SUBJECT PARCEL Exhibit 4 weighs approximately 80.6 gross grams, and is described as a Priority Mail envelope, measuring approximately 12.5" X 9.5." SUBJECT PARCEL Exhibit 4 is affixed with \$7.75 in postage. SUBJECT PARCEL Exhibit 4 is currently located in the Drug Evidence Vault at the Drug Enforcement Administration Las Vegas District Office, 550 S. Main Street, Las Vegas, NV 89101, located within the District of Nevada. (I refer to SUBJECT PARCELS Exhibits 1 - 4 together as the SUBJECT PARCELS.)

USE OF USPS TO TRAFFICK CONTROLLED SUBSTANCES

12. Based on my training and experience, drug trafficking intelligence information gathered by the United States Postal Inspection Service ("USPIS"), and discussions and collaborative investigations with United States Postal Inspectors, I believe that the U.S. Postal

1 Service Express Mail and Priority Mail are frequently utilized by drug traffickers for shipping
2 controlled substances or proceeds/payments. Use of Express Mail and Priority Mail are favored
3 because of the speed (Express Mail - overnight; Priority mail - two day delivery), reliability, free
4 telephone and Internet package tracking service, as well as the perceived minimal chance of
5 detection. Express Mail and Priority Mail were originally intended for urgent, business to
6 business, correspondence. Intelligence obtained from prior similar packages, which were found to
7 contain controlled substances or proceeds/payments, has indicated that these labels are usually
8 from an individual to an individual. Express Mail and Priority Mail are seldom used for
9 individual to individual correspondence. I also know that drug traffickers prefer delivery services
10 such as Express Mail and Priority Mail because of their expedited service.

11 13. In an effort to combat the flow of controlled substances through the overnight
12 delivery services, the USPIS has established interdiction programs in cities throughout the United
13 States. These cities have been identified as known sources of controlled substances. The USPIS
14 conducted an analysis of prior packages mailed through overnight delivery and two day delivery
15 services which were found to contain controlled substances or proceeds/payments of controlled
16 substance sales. The analysis of these prior packages found that these labels were usually
17 addressed from an individual to another individual. In the fewer cases when overnight delivery
18 packages containing controlled substances or proceeds/payments and have displayed a business or
19 company name, it was usually proven to be a fictitious business or front company.

20 14. A source city or state is a location identified by USPIS that ships narcotics
21 outside of the identified city or state, and which receives shipments of proceeds from the sale of
22 narcotics. A destination city or state is a location identified by USPIS that receives narcotics
23 from source cities or states, and in turn ships proceeds from the sale of narcotics back to the
24 source cities or states. Based on my training and experience and the training and experience of

1 other Inspectors, I believe Las Vegas to be a source city due to its state laws regarding
2 marijuana, and due its proximity to Arizona and California which are adjacent to Mexico and
3 house increased drug trafficking. In turn, cities in states located in the Midwest, East Coast,
4 and the South have been determined to be destination states for narcotics.

5 15. Articles found to bear the characteristics described above are further scrutinized
6 by inspectors. Address verifications are conducted and the return addresses listed on the
7 articles are often either fictitious, or postal personnel familiar with the addresses are not familiar
8 with the listed sender name(s). Based on my training and experience, I know drug traffickers
9 will often use fictitious names or incomplete names and/or addresses in an attempt to conceal
10 their identity from law enforcement. It has been my experience in some instances where the
11 article contains a "valid" return address, it is an attempt to lend a legitimate appearance to the
12 article. In addition to address verifications, the articles are subject to trained narcotic-detecting
13 canine examination.

14 **PROBABLE CAUSE**

15 16. In October 2020, within a cryptocurrency money laundering investigation, I,
16 along with my team, learned information that Paul Philip Engstrom (ENGSTROM) was
17 narcotics trafficker here in Las Vegas, Nevada. A criminal history check shows that
18 ENGSTROM was convicted of a narcotics related crime in 2017, stemming from a 2015 sale
19 MDMA to an undercover police officer here in Las Vegas, Nevada.

20 17. On October 16, 2020, based in part on this information, my team conducted
21 surveillance at 487 Petal Dew Avenue, Las Vegas, Nevada 89183 (hereinafter the "Petal Dew
22 Location"), the address ENGSTROM listed on his Nevada driver's license. During this
23 surveillance, a member of my team observed ENGSTROM arrive at the Petal Dew Location
24 carrying a corrugated plastic tote consistent with the kind used by postal workers to carry mail

1 parcels. ENGSTROM then placed this tote into the front passenger seat of a Chevrolet
2 Silverado registered to and driven by Vincent Cuomo (CUOMO). ENGSTROM and CUOMO
3 then entered the garage, exited a short time later, and departed in their separate vehicles.

4 18. Based on an administrative subpoena of NV Energy, I learned that
5 ENGSTROM's mother is the power subscriber at 304 E. Silverado Ranch, Unit 1110
6 (hereinafter the "Silverado Ranch Location"). A check of open source information database
7 shows, however, that ENGSTROM's mother lives in Minnesota.

8 19. Believing the Silverado Ranch Location to be a stash location, my team
9 established video surveillance at the Silverado Ranch Location between December 10 and
10 December 28, 2020. During this time period, surveillance captured ENGSTROM, CUOMO,
11 and a third individual, Abraham Elliot (ELLIOT), coming and going from this apartment
12 complex but none appeared to reside there. In addition, a 2019 Nissan Rogue registered to
13 ENGSTROM entered and exited a garage associated with Unit 1110 on multiple occasions.

14 20. On December 29, 2020, members of my team established surveillance at the
15 Silverado Ranch Location. At separate times between 1:46 p.m. and 3:28 p.m. ENGSTROM,
16 CUOMO and ELLIOT arrived in vehicles registered in their names. When ENGSTROM
17 arrived, he retrieved a black backpack from his vehicle and walked toward Unit 1110.

18 21. Shortly thereafter, the Nissan Rogue exited the garage associated with Unit 1110.
19 Surveillance followed the Nissan Rogue near a Walmart Pharmacy located at 490 E. Silverado
20 Ranch Boulevard. The Nissan Rogue parked next to a Chevrolet Sonic registered to Joseph
21 Krieger (KRIEGER). A person believed to be ELLIOT exited the Nissan Rogue and went to
22 the back of his vehicle. KRIEGER also exited his vehicle and went to the back of his vehicle.
23 They both opened the hatchback of their vehicles and ELLIOT appeared to move something
24 from the rear of the Nissan Rogue to the rear of KRIEGER's hatchback. After conversing for a

1 few minutes, they each departed the location. The Chevrolet Sonic is a hatchback whose
2 backseat is accessible from the hatchback as well as the front seat.

3 22. Surveillance followed KRIEGER in the Sonic to a U.S. Post Office located at
4 1801 N. Martin Luther King Blvd, where KRIEGER was seen at the drive through drop box.

5 23. I then contacted a member of the U.S. Post Office Inspector Service and the
6 acting manager of the Post Office to access this postal box. From the postal box where
7 KRIEGER drove through, I retrieved 15 USPS Priority Mail envelopes near the top of the pile.
8 Each of these 15 envelopes bore a return name and address of Retouching by Lorie, 2613
9 Calico Hearts Ct., Las Vegas, NV 89106. The envelopes were destined for addresses in New
10 York, North Dakota, Florida, Washington, Kentucky, New Jersey, Pennsylvania, California,
11 Vermont, Wisconsin and St. Thomas (U.S. Virgin Islands). Because of the proximity in time to
12 when KRIEGER dropped mail and the parcels' location in the box, I believe these packages to
13 have been dropped by KRIEGER.

14 24. Later in the evening of December 29, 2020, I met with North Las Vegas Police
15 Department (NLVPD) Canine Detective M. Sullivan, P# 1871 at this Post Office. Detective
16 canine Nox examined all 15 USPS Priority Mail envelopes. Detective Sullivan advised that
17 Nox gave a positive alert to four of the Priority Mail envelopes by exhibiting a change of
18 behavior, indicating the presence of a narcotic odor or the odor of a controlled substance
19 (heroin, cocaine, and/or methamphetamine) within the Priority Mail envelopes. I seized these
20 four envelopes and they are described as Exhibits 1 - 4 in Attachment "A."

21 25. Upon further physical examination of the exterior of the envelopes, Exhibits 1, 3,
22 and 4 contain solid objects consistent with the shape of pills, and Exhibit 2 contains a pliable
23 material consistent with a powdered substance that has been flattened. Such information
24 corroborates Nox's observations.

1 26. An internet search of “Retouching by Lorie” reveals a website that lists it as a
2 photography business. As described, narcotics traffickers will often use legitimate businesses as
3 “covers” for their narcotics trafficking organization. Using a cover business to hide illegal
4 activities is a method in which narcotics traffickers attempt to avoid detection by law
5 enforcement.

6 27. Based upon my training and experience, and the investigation to date, I believe
7 ENGSTROM, CUOMO and ELLIOT are drug trafficking co-conspirators utilizing 304 E.
8 Silverado Ranch Boulevard Unit 1110 as a “stash house”, or a location utilized for the
9 receiving, packaging and distribution of narcotics. I also believe KRIEGER is a “runner”
10 utilized by ENGSTROM, CUOMO and ELLIOT to create further separation between them
11 and their customers. Furthermore, I believe the USPS Priority Mail envelopes seized as
12 Exhibit 1, Exhibit 2, Exhibit 3, and Exhibit 4 of the SUBJECT PARCELS came from the
13 Silverado Ranch Location and were placed in the drop box drive thru at the U.S Post Office by
14 KRIEGER.

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CONCLUSION

28. Further, I believe that there is probable cause to believe that the SUBJECT PARCELS contain controlled substances which constitute evidence of violations of the enumerated offenses. As such, I seek this Court's authorization to conduct a search of the SUBJECT PARCELS as fully described in Attachment "A," for the items sought to be seized as described in Attachment "B."

Respectfully Submitted,

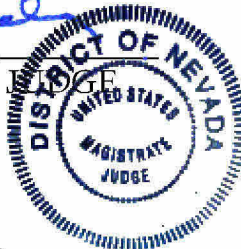


MARC LAING, Task Force Officer
Drug Enforcement Administration

Attested to by the applicant in accordance
with the requirements of Fed. R. Crim. P. 4.1
by telephone on December 31, 2020.



UNITED STATES MAGISTRATE JUDGE



ATTACHMENT "A"**PREMISES TO BE SEARCHED****FOUR SUBJECT PARCELS**

1. SUBJECT PARCEL Exhibit 1 is a USPS Priority Mail envelope, bearing a typed Label, and tracking number 9114 9023 0722 4923 2571 25, addressed to Ryan Parent, 249 Crest Rd, Novato, CA 94945, and sent by Retouching by Lorie, 2613 Calico Hearts Ct, Las Vegas, NV 89106. SUBJECT PARCEL Exhibit 1 weighs approximately 81.1 gross grams, and is described as a Priority Mail envelope, measuring approximately 12.5" X 9.5". SUBJECT PARCEL Exhibit 1 is affixed with \$7.75 in postage.
2. SUBJECT PARCEL Exhibit 2 is a USPS Priority Mail envelope, bearing a typed Label, and tracking number 9114 9023 0722 4923 2583 37, addressed to Spencer Gietzen, 450 Central Way Unit 2403, Kirkland, WA 98033, and sent by Retouching by Lorie, 2613 Calico Hearts Ct, Las Vegas, NV 89106. SUBJECT PARCEL Exhibit 2 weighs approximately 118.6 gross grams, and is described as a Priority Mail envelope, measuring approximately 12.5" X 9.5". SUBJECT PARCEL Exhibit 2 is affixed with \$7.75 in postage.
3. SUBJECT PARCEL Exhibit 3 is a USPS Priority Mail envelope, bearing a typed Label, and tracking number 9114 9023 0722 4923 2582 76, addressed to Andreas Osti, 130 Hempstead Ave Apt 401, West Hempstead, NY 11552-2156, and sent by Retouching by Lorie, 2613 Calico Hearts Ct, Las Vegas, NV 89106. SUBJECT PARCEL Exhibit 3 weighs approximately 80.9 gross grams, and is described as a Priority Mail envelope, measuring approximately 12.5" X 9.5". SUBJECT PARCEL Exhibit 3 is affixed with \$7.75 in postage.

1 4. SUBJECT PARCEL Exhibit 4 is a USPS Priority Mail envelope, bearing a typed Label,
2 and tracking number 9114 9023 0722 4923 2584 12, addressed to Alejandro Ruiz, 1681
3 Crocker Rd, Randolph Center, VT 05061, and sent by Retouching by Lorie, 2613
4 Calico Hearts Ct, Las Vegas, NV 89106. SUBJECT PARCEL Exhibit 4 weighs
5 approximately 80.6 gross grams, and is described as a Priority Mail envelope, measuring
6 approximately 12.5" X 9.5". SUBJECT PARCEL Exhibit 4 is affixed with \$7.75 in
7 postage.

8 SUBJECT PARCELS Exhibit 1, Exhibit 2, Exhibit 3 and Exhibit 4 are currently located in
9 the Drug Evidence Vault at the Drug Enforcement Administration Las Vegas District Office,
10 550 S. Main Street, Las Vegas, NV 89101, located within the District of Nevada.

ATTACHMENT "B"

ITEMS TO BE SEIZED

Based on the foregoing, I respectfully submit that there is probable cause to believe that the following items, which constitute evidence of violations of Title 21, United States Code, Sections 841(a)(1), will be found:

1. Controlled substances;
2. Currency or monetary instruments that represent the proceeds of drug trafficking;
3. Notes, documents or other items bearing the presence of the odors of controlled substances, including heroin, cocaine, marijuana, and/or methamphetamine; and
4. Notes, documents or other items that constitute evidence of drug trafficking.